UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN

Case No.: 10-CV-281

PROMEGA CORPORATION,

Plaintiff,

MAX-PLANCK-GESELLSCHAFT ZUR FORDERUNG DER WISSENSCHAFTEN E.V.,

Involuntary Plaintiff,

v.

LIFE TECHNOLOGIES CORPORATION, INVITROGEN IP HOLDINGS, INC., and APPLIED BIOSYSTEMS, LLC,

Defendants.

Joint Stipulation and Motion to Reset Certain Post-Trial Filing Dates

Now Come the Plaintiff, Promega Corporation and the Defendants, Life Technologies Corporation, et al., by and through their respective counsel, and respectfully stipulate and request that the dates for certain post-trial filings by each of the parties be reset, and in support of that request state:

1.) The parties have diligently sought to reach a stipulation and agreement concerning an appropriate injunction related to sales of certain products. To that end, and in an effort to address resolution of all matters, senior officers of the parties are meeting in Madison, Wisconsin beginning Thursday, March 15. The parties have previously met at length and have begun the process of conversion of STR purchasers consistent with the jury verdict and the Court's holdings. The parties believe this effort would be materially advanced with an appropriate

resetting of the dates and that both the parties and the Court's post-trial matters are likely to be materially affected.

- 2.) The parties and the Court would be assisted by having a single set of dates for filing, response and reply applicable to all substantive post-trial filings which are permitted to be amended by Court order.
- 3.) The parties stipulate and agree, subject to the Court's approval and Order, and accordingly move that the Court's prior Order of February 15, 2012 setting dates be amended to reset all dates which are permitted to be amended by Court order as follows:

Opening Motions/Briefs	March 15, 2012	reset to April 2, 2012
Responsive Briefs	March 29, 2012	reset to April 19, 2012
Reply Briefs	April 9, 2012	reset to April 30, 2012

Respectfully Submitted this 12th day of March, 2012.

By: /s/ James R. Troupis
James R. Troupis, SBN 1005341
Peter G. Carroll (admitted pro hac vice)
Stewart W. Karge (admitted pro hac vice)
Sarah E. Troupis, SBN 1061515
Brandon M. Lewis, SBN 1086824
Troupis Law Office, LLC
8500 Greenway Blvd., Suite 200,
Middleton, WI 53562
Ph: 608-807-4096
jrtroupis@troupislawoffice.com

Counsel for Plaintiff

By: /s/ Kristine Edde Johnson

Francis M. Wikstrom (admitted *pro hac vice*)
Kristine Edde Johnson (admitted *pro hac vice*)
Michael R. McCarthy (admitted *pro hac vice*)
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, UT 84111
Ph: 801-532-1234
F: 801-536-6111
fwikstrom@parsonsbehle.com
kjohnson@parsonsbehle.com
mmccarthy@parsonsbehle.com

Counsel for Defendants